

1 HONORABLE RICARDO S. MARTINEZ

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5 UNITED STATES DISTRICT COURT  
6 WESTERN DISTRICT OF WASHINGTON  
7 AT SEATTLE

8 RAQUEL REYNOLDS, a single person,

9 Plaintiff,

10 v.

11 CITY OF SEATTLE; et al.,

12 Defendants.

NO. 2:21-cv-01560-RSM

DEFENDANTS' REPLY IN SUPPORT OF  
MOTION TO DISMISS UNDER FRCP  
12(c)

NOTED FOR CONSIDERATION:  
November 4, 2022

*Without Oral Argument*

13  
14 Defendants City of Seattle, Pete Cavinta, Jr., Scotty Bach, Daniel Kim, German Barreto,  
15 Kira Guzman, and Raymond Fischer ("defendants") request that this Court grant dismissal for the  
16 reasons set forth in their Motion for Judgment on the Pleadings (Dkt. # 18). Plaintiff's response  
17 to the defendants' motion was due October 24, 2022 (LCivR 7(d)), and she has not filed a response  
18 to date. Pursuant to LCivR 7(b)(2), "Except for motions for summary judgment, if a party fails to  
19 file papers in opposition to a motion, such failure may be considered by the court as an admission  
20 that the motion has merit." Defendants respectfully request the Court grant their Motion for  
21 Judgment on the Pleadings, and because no amendment could cure the numerous deficiencies in

DEFENDANTS' REPLY IN SUPPORT OF  
MOTION TO DISMISS UNDER FRCP 12(c) - 1  
(NO. 2:21-cv-01560-RSM)

**CHRISTIE LAW GROUP, PLLC**  
2100 WESTLAKE AVENUE N., SUITE 206  
SEATTLE, WA 98109  
206-957-9669

1 plaintiff's complaint, they respectfully request that this Court dismiss it with prejudice.

2 DATED this 31st day of October, 2022.

3 CHRISTIE LAW GROUP, PLLC

4 By /s/ John W. Barry

5 ROBERT L. CHRISTIE, WSBA #10895

6 JOHN W. BARRY, WSBA #55661

7 Attorneys for Defendants

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DEFENDANTS' REPLY IN SUPPORT OF  
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